

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

ISMAEL MARRERO ROLON, *et. al.*,

Plaintiff,

V.

**AUTORIDAD DE ENERGIA
ELECTRICA A/K/A PUERTO RICO
ELECTRIC POWER AUTHORITY; *et.*
*al.***

Defendants.

CIVIL NO.: 15-cv-1167 (JAG)

CLASS ACTION COMPLAINT

TRIAL BY JURY DEMANDED

MOTION FOR LEAVE TO FILE EXCESS OF PAGE

(Re: Alchem's Motion to Dismiss Pursuant to Fed. R. Cir. P. 12(b)(6))

**TO THE HONORABLE JAY GARCIA-GREGORY
UNITED STATES DISTRICT JUDGE
FOR THE DISTRICT OF PUERTO RICO**

COMES NOW Defendants, Altol Chemical Environmental Laboratory, Inc. ("Altol Chemical") and Altol Environmental Services, Inc. ("Altol Environmental") (hereinafter collectively referred to as "Alchem"), and through the undersigned attorneys, respectfully state and request as follows:

1. On February 24, 2015, Defendants filed an **80-page** RICO Class Action Complaint, which includes a state law claim for unjust enrichment. (D.E. # 1, Complaint.)
2. Pursuant to L.Cv.R. 7(d), dispositive motions should not exceed 25 pages. Nevertheless, due to the sheer number of averments and the complicated nature of the arguments asserted by Plaintiffs, Alchem very respectfully submits that good cause exists in this case to exceed that limit.

3. Accordingly, Alchem very respectfully requests leave from the Court to submit its Motion to Dismiss, filed on this date, in excess of 25 pages.

WHEREFORE, Alchem respectfully requests leave to file its Motion to Dismiss in excess of the 25-page limit of Local Rule 7(d).

CERTIFICATION OF SERVICE, I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system with will send notification of such filing to all attorneys of record registered in the use of the CM/ECF system in this case.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 1st day of May, 2015.

s/Rolando Emmanuelli Jiménez

Rolando Emmanuelli-Jiménez

USDC – PR No. 214105

Bufete Emmanuelli, C.S.P.

P.O. Box 10779

Ponce, Puerto Rico 00732-0779

TEL. (787) 843-8406; Fax (787) 848-6586

E-mail: remmanuelli@me.com

s/Thomas Trebilcock Horan

Thomas Trebilcock-Horan

USDC - PR No. 220514

Trebilcock & Rovira, LLC

Ochoa Building

Suite 201, Tanca Street

San Juan, PR 00901

Phone No. (787) 723-0439

E-mail: ttrebilcock@trebilcockrovira.com